



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J.

10/15/2024

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Muslim American Society of Queens, et al., v. U.S. Citizenship and Immigration Services, et al., No. 23 Civ. 2867 (VSB)*

Dear Judge Broderick:

This Office represents the government in this action, in which plaintiffs seek judicial review of the denials by U.S. Citizenship and Immigration Services (“USCIS”) of two Forms I-129, Petitions for a Nonimmigrant Worker, that plaintiff Muslim American Society of Queens filed on behalf of plaintiff Akram Abdelsattar Hassanin Kassab. I write respectfully to request a further 21-day extension of the government’s deadline to file its motion for summary judgment (i.e., from October 15, 2024, to November 5, 2024). After discussion with plaintiffs’ counsel, I further request extensions of the parties’ remaining briefing deadlines set out in this Court’s order (ECF No. 27). The new proposed briefing schedule would be:

- The government’s motion for summary judgment due by November 5, 2024;
- Plaintiffs’ opposition and any cross-motion for summary judgment or motion for additional discovery due by December 9, 2024;
- The government’s reply and any opposition to plaintiffs’ additional motions due by January 13, 2025; and
- Plaintiffs’ reply to the government’s opposition due by February 3, 2025.

Pursuant to this Court’s order (ECF No. 23), on August 16, 2024, the government filed the certified administrative records of USCIS’s decisions on the Forms I-129 that plaintiffs are challenging in this case. ECF Nos. 24, 25. This Court then granted the government’s first request for an extension of its motion for summary judgment and corresponding extensions of the remaining deadlines. ECF No. 27. The government respectfully requests another brief extension of its deadline to file a motion for summary judgment because counsel needs additional time to confer with USCIS and to finalize the government’s papers in support of its motion. This is the government’s second request for an extension of its deadline to file its motion for summary judgment and for extensions of the remaining briefing deadlines, and plaintiffs consent to this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

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cc: Counsel of record (via ECF)